

ORD 1025
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From: MOORE Fredrick
To: Bath, Bill; Cole, Connie
Subject: FW: Discussion w/ Gary Vrooman
Date: Monday, May 14, 2012 11:14:27 AM

Hi Bill and Connie,

FYI, Fredrick

From: MOORE Fredrick
Sent: Monday, May 14, 2012 10:05 AM
To: DRUBACK Lissa
Cc: MONROE Sheila; KIRK Marcy; SCHWARZ Bob; WHEELER Sarah; VROOMAN Gary L
Subject: Discussion w/ Gary Vrooman

Hi Lissa, I just talked with Gary regarding the RCRA issues I forwarded him and here's what we discussed:

1. To the treatment issue, it is the case that we regulate treatment by the unit. We think that if we want only to mention they can use the light bulb and vacuum system, and we don't care if they don't, that is OK. Practically, if this becomes too much of a big deal with EPA, and Lockheed is fine with not using them, that might be they way to go.
2. For generator issues: We do think that what we can do is both put in conditions in the permit we want, like high-level alarms and continuous storage, but also state they are under generator requirements like notification if they get into another generator status, manifest waste offsite, etc. They permit can identify they still have to comply with generator requirements, but noncompliance with those would not be a permit violation.
3. To the citation issue, Gary thinks the new wording is fine and if EPA disagrees, at some point they need to explain specifically why. My preference would be a why in writing.

Gary, if I missed something, let us know.

Cheers, Fredrick

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